

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,)	No. 3:15CR148TMR
)	
Plaintiff,)	<u>PROTECTIVE ORDER</u>
)	
v.)	
)	
1. WILLIAM APOSTELOS)	
)	
2. CONNIE APOSTELOS)	
)	
Defendants.)	

Pursuant to Federal Rule of Criminal Procedure 16(d)(1), for good cause shown, the Court hereby grants the unopposed motion of the United States for entry of a Protective Order, prescribing the manner defendants William Apostelos and Connie Apostelos as well as their respective counsel must handle certain materials that will be produced to them in discovery - namely, documents and other records that containing personal identifying information of individuals, including, but not limited to, their names, dates of birth, social security numbers, and financial information (collectively, "the Discovery Materials") - to as follows:

1. Defendants' counsel, William Apostelos, and Connie Apostelos will not disclose the information contained in the Discovery Materials directly or indirectly to any person except:

attorneys or investigators who are assisting in defense; individuals who the defense interviews as potential witnesses; and potential experts ("Authorized Individuals"). Upon disclosing information contained in the Discovery Materials to an Authorized Individual, defendants' counsel, William Apostelos, and Connie Apostelos must provide the Authorized Individual with a copy of the Court's Protective Order and advise the Authorized Individual that he or she will be subject to the same obligations as imposed upon defendant's counsel by the Protective Order.

2. Defendant's counsel shall not copy, reproduce or create a mirror image of the Discovery Materials unless copied, reproduced, or mirror imaged for Authorized Individuals to assist in the defense, and in that event, the copies, reproductions, or mirror images should be treated in the same manner as the original Discovery Materials. Defendant's counsel shall maintain a log of any copies, reproductions, or mirror images made of the Discover Materials and to whom they were distributed.

3. Defendants' counsel, William Apostelos, and Connie Apostelos may use the Discovery Materials solely in the defense of this case and for no other purpose.


4. At the conclusion of this case, defendants' counsel William Apostelos, and Connie Apostelos shall return the Discovery Materials and copies, reproductions, or mirror images thereof to the United States.

5. Defendants' counsel shall inform their respective clients of these prescriptions placed on the Discovery Materials, and direct them not to disclose or use any information contained in the Discovery Materials in violation of the Protective Order. However, nothing contained in the Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.

1/4/2016

1-4-16

DATE



HONORABLE THOMAS M. ROSE
UNITED STATES DISTRICT COURT JUDGE